

UNITED STATES DISTRICT COURT
DISTRICT OF WYOMING

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHAWN RICHARD FLETT,

Defendant.

CRIMINAL COMPLAINT

SEALED

Case Number: 25-MJ-10-SWS

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

On or about October 2, 2024, in the District of Wyoming, the Defendant, **SHAWN RICHARD FLETT**, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, namely, a Springfield Armory (HS Produkt), Model XD9, 9mm caliber pistol bearing serial number GM764982, and the firearm was in and affecting commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(8).

I further state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms & Explosives and that this complaint is based on the following facts:

(See attached Sworn Statement)

Continued on the attached sheet and made a part hereof.



Signature of Complainant
KRYSTAL STEVENSON

Sworn to before me and subscribed in my presence,

February 4, 2025

Date

at 2:27 p.m.

at

Cheyenne, Wyoming

City and State

HONORABLE SCOTT P. KLOSTERMAN
United States Magistrate Judge

Name & Title of Judicial Officer



Signature of Judicial Officer



**SWORN STATEMENT IN SUPPORT OF CRIMINAL COMPLAINT
SPECIAL AGENT KRYSTAL STEVENSON
UNITED STATES v. SHAWN RICHARD FLETT**

I, Krystal Stevenson, being duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been so employed since April 2021. I am currently assigned to the ATF Cheyenne Field Office and am responsible for the investigation of violations of federal firearms, explosives, and arson laws.
2. I have received extensive law enforcement training at the Department of Homeland Security's Criminal Investigative Training Program and the ATF's Special Agent Basic Training at the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia. This six-month training program covered subject matters that included federal criminal statutes, interviewing techniques, arrest procedures, use of force, search and seizure authority, narcotics, undercover techniques, search warrant applications, and various other investigative techniques.
3. As a Special Agent with the ATF, I have experience and am responsible for investigating violations of federal criminal law. Throughout my career, I have participated in and conducted investigations which have resulted in the arrests and convictions of individuals involved in illegal firearms activity, including violations of the Gun Control Act, 18 U.S.C. §§ 921 – 931 (Chapter 44 of Title 18, United States Code), and violations of the National Firearms Act, 26 U.S.C. §§ 5801 – 5872 (Chapter 53 of Title 26, United States Code).
4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, law enforcement officials,

witnesses, and physical evidence to include surveillance footage. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and does not set forth all my knowledge about this matter. To the best of my knowledge and belief, all statements made in this affidavit are true and correct.

5. This affidavit is submitted in support of an arrest warrant and criminal complaint charging Shawn Richard FLETT (YOB 1986) with the violation of Title 18 U.S.C. § 922(g)(1) Felon in Possession of a Firearm. I submit probable cause exists to believe that on or about October 2, 2024, in the State and District of Wyoming, FLETT, did knowingly possess a firearm, that is: a Springfield Armory (HS Produkt), Model XD9, 9mm caliber pistol bearing serial number GM764982.
6. On October 2, 2024, Casper Police Officers responded to a call for a disturbance at a business in Casper, Wyoming. Upon arrival, Officers located FLETT inside of a vehicle in the parking lot and he stated that he and his wife, D.F. got into an argument, and he threw his hard hat towards her as she got out of the vehicle. He stated the hard hat bounced off the door and hit D.F.
7. During an interview with D.F., she stated the argument started when she found what she believed to be methamphetamine in FLETT's pants pocket at their apartment in Casper. The argument continued to her place of employment and that is where he threw his hard hat at her. She further stated that FLETT had a firearm hidden in a floor vent which was located in an interior corridor at their apartment complex which was commonly accessible to the public.
8. Officers went to the apartment complex and found the firearm where D.F. stated it would be. The firearm is described as a Springfield Armory (HS Produkt), Model

XD9, 9mm caliber pistol bearing serial number GM764982. The firearm was checked by the Casper Police Department and the firearm had previously been reported as stolen.

9. On October 3, 2024, Casper Police Officers Webb and Everett went to the Natrona County Detention Center where FLETT was incarcerated. A review of body camera footage showed Officer Everett read FLETT his *Miranda* rights and FLETT admitted that an individual named “R.D.” gave him the firearm that was located in the floor vent as a way to pay back a debt. FLETT claimed he had possession of the firearm for a “day or two” prior to his arrest.
10. ATF Special Agent Matt Wright determined the Springfield Armory (HS Produkt), Model XD9, 9mm caliber pistol bearing serial number GM764982, was manufactured in Croatia.
11. I confirmed that FLETT has multiple felony convictions including a 2021 conviction in the State of California for Taking a Vehicle without Owner’s Consent/Vehicle Theft, a crime punishable by a term of imprisonment of more than one year. FLETT has not had his firearm rights restored by the State of Wyoming.
12. Based on my training, education, and experience, and the information provided to me, I believe Shawn Richard FLETT violated Title 18 U.S.C. § 922(g)(1), by knowingly possessing a firearm as a convicted felon.

END OF SWORN STATEMENT

PENALTY SUMMARY

DEFENDANT NAME: SHAWN RICHARD FLETT

DATE: February 4, 2025

INTERPRETER NEEDED: No

VICTIM(S): No

OFFENSE/PENALTIES: 18 U.S.C. §§ 922(g)(1) and 924(a)(8)
(Felon in Possession of a Firearm)

0-15 Years Imprisonment
Up to \$250,000 Fine
3 Years Supervised Release
\$100 Special Assessment

AGENT: Krystal Stevenson, ATF

AUSA: Paige N. Hammer
Assistant United States Attorney

ESTIMATED TIME OF TRIAL: 1 to 5 days

WILL THE GOVERNMENT SEEK DETENTION IN THIS CASE: Yes

ARE THERE DETAINERS FROM OTHER JURISDICTIONS: No